

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

In re

FIELDWOOD ENERGY LLC, *et al.*<sup>1</sup>

Debtors.

Chapter 11

Case No. 20-33948 (MI)

(Jointly Administered)

**CERTIFICATE OF COUNSEL TO PLAN ADMINISTRATOR'S SECOND OMNIBUS  
OBJECTION TO CLAIMS PURSUANT TO SECTION 502(b) OF  
THE BANKRUPTCY CODE AND RULE 3007 OF THE FEDERAL RULES OF  
BANKRUPTCY PROCEDURE SEEKING TO DISALLOW CERTAIN CLAIMS**

(Related Docket Nos. 2077)

The undersigned hereby certifies as follows:

1. On October 6, 2021, the *Plan Administrator's Second Omnibus Objection To Claims Pursuant To Section 502(B) Of The Bankruptcy Code And Rule 3007 Of The Federal Rules Of Bankruptcy Procedure Seeking To Disallow Certain Claims (Multi-Debtor Claims)* [Docket No. 2077] (the "Second Omnibus Objection")<sup>2</sup> was filed with the Court by the administrator of the chapter 11 plan of the above-captioned reorganized debtors. The deadline for parties to file a response to the Second Omnibus Objection, unless extended by separate agreement filed on the Court's Docket, was November 5, 2021 (the "Objection Deadline").

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, as applicable, are: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Energy LLC (6778); Fieldwood Energy Inc. (4991); Fieldwood Energy Offshore LLC (4494); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); FW GOM Pipeline, Inc. (8440); GOM Shelf LLC (8107); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422). The Debtors' primary mailing address is 2000 W. Sam Houston Parkway S., Suite 1200, Houston, TX 77042.

<sup>2</sup> A capitalized term used but not defined herein shall have the meaning ascribed to it in the Second Omnibus Objection.  
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2. On November 4, 2021, the Plan Administrator and Cox Oil, LLC and related entities thereof (collectively, the “Adjourned Claimants”) whose claims are subject to the Second Omnibus Objection entered into a stipulation [Docket No. 2144] extending such parties’ response deadlines and/or the hearing date on the Second Omnibus Objection.

3. Attached hereto as **Exhibit 1** is an amended proposed form of order (the “Revised Proposed Order”), which indicates that the hearing on Second Omnibus Objection has been adjourned solely with respect to the Adjourned Claimants, which are identified in Schedule 2 to the Revised Proposed Order. In addition, the Revised Proposed Order resolves all known informal comments received by the Plan Administrator regarding the Second Omnibus Objection and no formal responses were filed on the Court’s Docket prior to the Objection Deadline.

4. Accordingly, the Plan Administrator respectfully requests entry of the Revised Proposed Order attached hereto as **Exhibit 1**. A redline reflecting changes from the proposed form of order filed with the Second Omnibus Objection to the Revised Proposed Order is attached hereto as **Exhibit 2**.

Dated: November 23, 2021

Respectfully submitted,

/s/ Michael D. Warner

Michael D. Warner, Esq.

(TX Bar No. 00792304)

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*Counsel for the Plan Administrator*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 23<sup>rd</sup> day of November, 2021, a true and correct copy of the above and foregoing has been served by electronic transmission to all registered CM/ECF users appearing in these cases.

/s/ Michael D. Warner  
Michael D. Warner, Esq.